

In the united states district Court for  
the northern district of Ohio

Monty Robinson  
Plaintiff

Case no. \_\_\_\_\_

-VS-

Judge \_\_\_\_\_

Adult & Teen Challenge

Hope Counseling

Bob Pavlich

Complaint

David Chadwell

Alisha Tantili

Joey Vanheez

C. Righettetti - Rimedio (Commissioner)

A. Traficanti (Commissioner)

D. Ditzler (Commissioner)

Comes now pro se plaintiff Monty Robinson to  
redress the deprivation of rights under color of law pursuant  
to 42 U.S.C. 1983 whereas the court has jurisdiction under  
28 USC 1331 whereas this plaintiff has exhausted administrative  
remedies to no avail. Plaintiff Robinson claims for injunctive  
relief are authorized by 28 USC sec. 2203, and 2204 and  
rule 65 FRCP whereas this plaintiff moves to sue  
defendants individually and in their official capacities.

wherefore, Plaintiff respectfully pray that this court  
enter judgement granting plaintiff nominal and punitive along  
with monetary damages in the amount 1.2 Million  
against each defendant, jointly and severally; and

The Violations listed in the complaint consist of the following in no specific order:

### Violations of Religious Land Use and Institutionalized Persons Act (RLIPA)

The Adult & Teen challenge facility center accepting funds cannot deny clients the necessary accommodations to engage in activities for the practice of their own religious beliefs to which they have done by supplying only christian bibles and allowing this to be the only book made available, in effect advancing only christianity, offering christian services and restricting all others and services and physical religious books. The facility should not make special accommodations, rules or give special benefits to members of only one religion in this fashion without reason because the facility is a faith based program yet only represents and only acknowledges one faith which is christianity which is wrong because there is more than one religion and there are human beings flesh and blood that were brought up as buddist, ISrealites, muslim, hindu and etc... so the program should offer up more than one out look on faith because it looks as though they only care about christianity nothing else.

any additional relief this court deems just, proper and equitable.

The facts stated here in are enclosed see 6 pages attached. Haines vs Kerner 404 vs 519 I ask the Court to look to the substance of the pleading rather than the form.

Duties of defendants in violation of statutory regulations, civil rights as well as but not limited to fiduciary obligations in reference to why they are named in this complaint; and obstruction of religious rights.

Adult & Teen Challenge Rehabilitation offer clients of different religious beliefs no type of special areas to make congregational prayers, while clients of christian faith are awarded a specific room to worship and pray as they like. Although this facility is a faith based program if you come into the facility with any other material other than the bible such as the Quran, torah, they make you get rid of it.

Adult & Teen Challenge is a faith based program so with that being said this plaintiff feels as though that Adult & Teen Challenge should be willing and ready to encounter anyone with what ever religious beliefs known to man because how can they reach anyone if they cant understand them, or even understand their upbringing.

Adult & Teen Challenge Rehabilitation facility upon being accepted into the Program have clients sign up for medicare as well as foodstamps through MR. david chadwell. he has clients reading from a handwritten script telling us clients to say that we buy and prepare our own food which untrue because MS's tantili's mother prepare all meals except on weekends.

The plaintiff is of Islamic beliefs so he doesn't eat pork and made sure to make the facility aware of this upon his arrival May 11<sup>th</sup> 2023<sup>rd</sup> and he made Ms. Tantil aware of this again during his assessment either the 15<sup>th</sup> or 16<sup>th</sup> of May 2023. Once the plaintiff start to witness the constant flow of pork being served did he ask about the proper protocol to take to see about any accommodations.

On May 24<sup>th</sup> did the plaintiff approach an intern about the steps to take, in which the intern stated to the plaintiff that he could talk to the second shift supervisor Mr. James T. . So The plaintiff did that and in which Mr. James T. told the plaintiff that he had to talk with his case manager which was MR. JOEY VORHEEZ, James T. sent a text to Mr. Vorheez and Mr. Vorheez texted for the plaintiff to be sent down. Upon reaching Mr. Vorheez's office did the plaintiff tell

Mr. Vorheez the issue at hand. Mr. Joey Vorheez then stated to the client that he needed to write a letter to Mrs. Alisha Tantili to address the matter. So the plaintiff wrote the letter to Ms. Tantili, as it would be Ms. Tantili came up the next day at lunch time which is 12:00pm because it had gotten back to her someone didn't like the menu. So upon the plaintiff being aware of Ms. Tantili present he then proceeded to talk one on one and hand her the letter in which she wouldn't let the plaintiff get a word in nor did she ever acknowledge the written letter and told the plaintiff that she wasn't accommodating me.

Mr. Joey Vorheez was assigned to the plaintiff due to him being bumped to phase two. Mr. Vorheez always had an excuse to why the plaintiff could not contact his parole officer, as well as all calls being on speaker phone. Adult & Teen Challenge also reads outgoing which the plaintiff finds disturbing because reading the incoming is one thing but to read outgoing is another. The plaintiff couldn't be intimate with his wife or have certain conversations with his children about personal issues, etc. Even prison's don't read the outgoing mail.

Ms. Tantili, Mr. Vorhees, Mr. Paulich, and Mr. Chadwell are mentioned in this complaint because of their dereliction of duty because of the~~y~~ where made aware of the Plaintiff's problems did nothing to fix them nor did they try to do an investigation of any kind.

The Plaintiff and clients were allowed to consume Parishable's well beyond their expiration date such as 3 year old kind bars, three year old chips, etc... This became a problem for the Plaintiff because upon entry to the program Adult and Teen Challenge have clients sign up for food stamps, so it became mind blowing that Ms. Tantili of Adult and Teen Challenge as well as Mr. Paulich wouldn't accommodate the Plaintiff about his beliefs.

Mahoning County commissioners on behalf of Mahoning County/Adult & Teen Challenge are responsible of funding the operations of overseeing the agency to ensure compliance with such statutes and regulations as well as task with our sight of others or drafting relevant policies.

Adult and Teen Challenge Kicked the plaintiff out without warning or any notice like they would've notified a person of christian beliefs. The plaintiff feels as though all his problems came once he started to exercise his religious beliefs. They also wouldn't let the plaintiff contact his parole officer once he felt as though the program wasn't working for him because he was there to receive help rather than obstacles being thrown his way.

The plaintiff ask numerous times to contact his Parole officer and was denied any calls every time. Also the out going mail was being monitored so when I was asking my child's mother to call they wouldn't send my letters out.

Hope counseling are being allowed to get away with misappropriation of funds because if the government gives them the day off due to a holiday they make clients make that day if the holiday falls on a class day because they didn't get paid and our insurance pays them hourly.

List of defendants

hope counseling

Bob Pavlich

Alisha Tantili

Joey Vorheez

davis Chadwell

C. Righettetti - Rimedio Commissioner

A. Traficanti Commissioner

D. Ditzler Commissioner

They refused to give copies for every sigel  
defendant



for the reason stated herein this petitioner seeks assistance in not only alleviating of future problems but nominal and punitive damages regarding the violation of this plaintiffs rights, violation of public policy mental and emotional suffering, the defendants knowledge of their breach of duty gross negligence, as well as but not limited to the persistence of there ongoing effects.

Regarding the fact that the defendants have knowledge of these ongoing issues creates a careless breach of duty and based on the defendants assets in part, in order to account for the significance in the punitive assessment of this suit? requesting nominal value as well to the amount of 1 million 2 hundred thousand in total (1.2 Million) \$200,000 in punitive.

I declare under penalty of perjury the foregoing is true and correct.

*Monty* Robinson.

Critical  
~~Critical~~ and unusual punishment Emotional distress  
Appalachian Fraud

- ① Allowed another client to use racial slurs towards me
- ② not accomadating me for not eating pork due to my religious beliefs
- ③ Insurance fraud the holidays they get off due to the government they have us make up those days because our insurance pays for our classes
- ④ wrongful termination
- ⑤ They were denying me the right to call my Parole officers because I was trying to switch rehabs
- ⑥ They had us eating three year old items such as chips, milk's, kind bars and these things carry cancer Carcenogens
- ⑦ Emotional distress I was trying to recieve help and instead I have to go to prison
- ⑧ discrimination They kept causing problems due to my beliefs

who

when

why

what

where

1. ~~most~~ ~~of~~ theft of property
2. They wouldn't accommodate me for not eating pork
3. we were eating three year old items
4. wrongful termination
5. Allowed another client to use racial slurs towards me
6. They were denying me the right to call my parole officer because ~~they~~ <sup>they knew</sup> ~~I knew that~~ ~~eventually they would kick me out~~
7. I <sup>went</sup> ~~wanted~~ there to receive help and instead receive prison time <sup>emotional distress</sup> instead
8. ~~I wanted~~ to call my parole officer